

## 5.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe a reasonable range of project alternatives that could feasibly attain the basic objectives of the project, while avoiding or reducing impacts associated with the project.

According to CEQA Guidelines Section 15126.6(a), the discussion of alternatives must focus on alternatives to the project, or to the project location, which will avoid or substantially reduce any significant effects of the project, even if the alternatives would be costlier or hinder to some degree the attainment of the project objectives.

The “No Project” alternative must also be evaluated. The “No Project” analysis must discuss the existing conditions and what would reasonably be expected to occur in the foreseeable future if the proposed project was not approved.

The range of alternatives required is governed by a “rule of reason,” meaning that the EIR must only evaluate those alternatives necessary to permit a reasoned choice. The alternatives must be limited to only ones that would avoid or substantially lessen any of the significant effects of the proposed project.

Additionally, an EIR should not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. The CEQA Guidelines also require an EIR to state why an alternative is being rejected. If the City ultimately rejects any or all alternatives, the rationale for rejection will be presented in the findings that are required before the City certifies the EIR and takes action on the proposed project.

According to Section 15126.6(f)(1) of the CEQA Guidelines, among the factors that may be taken into account when addressing feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternate site.

CEQA requires that an environmentally superior alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the No Project Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project’s basic objectives be chosen as the environmentally superior alternative.

## 5.2 PROJECT OBJECTIVES

The purpose of the proposed project is to create a highly amenitized, pedestrian-oriented, sustainable agrihood community that provides a mix of product types, creating opportunities for attainably-priced housing across income groups in conformance with the City's 2019 Housing Element Update (City of Encinitas 2019b). The objectives of the proposed project are presented in Section 2.0, Project Description.

## 5.3 IMPACTS OF THE PROPOSED PROJECT

Based on the analysis contained in Section 3.0, Environmental Analysis, the only significant and unavoidable impact (unable to fully mitigate below established thresholds) relates to vehicle miles traveled (VMT); refer to Section 3.12, Transportation. Other impacts, including impacts related to biological resources, cultural resources, geology and soils (including paleontological resources), hazards and hazardous materials, and Tribal Cultural Resources, would be mitigated to less than significant with incorporation of mitigation measures. Impacts to Agriculture and Forestry Resources, Aesthetics, Air Quality, Energy Conservation and Climate Change, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Resources and Recreation, and Utilities and Service Systems were found to be less than significant.

## 5.4 ALTERNATIVES TO THE PROPOSED PROJECT

This analysis focuses on alternatives capable of eliminating significant adverse environmental effects or reducing them to less than significant levels, even if these alternatives would impede, to some degree, the attainment of the proposed project objectives. As noted previously, the CEQA Guidelines (Section 15126.6(e)(2)) require that the alternatives discussion include an analysis of the No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions (i.e., implementation of current plans) and what would reasonably be expected to occur in the foreseeable future if the project was not approved. Further, CEQA Section 15126.6(a) provides that an EIR need not consider every conceivable alternative to a project; rather, an EIR need only consider a reasonable range of alternatives. The following alternatives have been identified for analysis in compliance with CEQA:

- **Alternative 1:** No Project
- **Alternative 2:** Increased Intensity of Existing Agricultural Operations
- **Alternative 3:** VMT Reduction

Table 5-1, Comparison of Alternative Project Impacts to the Proposed Project, summarizes the potential impact of each alternative on the environmental resources evaluated in the EIR that require mitigation as compared to the proposed project.

**Table 5-1 Comparison of Alternative Project Impacts to the Proposed Project**

Topic	Alternative 1: No Project	Alternative 2: Increased Agricultural Operations	Alternative 3: VMT Reduction
Biological Resources	<	=	=
Cultural and Tribal Cultural Resources	<	=	=
Geology and Soils (Paleontological Resources)	<	=	=
Hazards and Hazardous Materials	>	>	=
Transportation <sup>1</sup>	=	=	=

Notes:

- = Impact is equivalent to impact of proposed project (neither environmentally superior nor inferior).
- < Impact is less than impact of proposed project (environmentally superior).
- > Impact is greater than impact of proposed project (environmentally inferior).
- 1 Transportation impacts are based upon VMT (not total traffic volume) impacts. Refer to Section 3.12.

## ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The project site is located within the Sidonia East Planning Area of the Encinitas Ranch Specific Plan. As part of the 2019 HEU, the project site was designated with an R-30 Overlay and allocated between 246 and 296 residential units. Conforming edits were then made to the Encinitas Ranch Specific Plan to add an ER-R-30 zone and apply this new zoning overlay to the project site. Therefore, the current zoning is consistent with the General Plan, Zoning Map, Local Coastal Program, and the provisions of the 2019 Housing Element Update.

Under the No Project Alternative, the proposed project would not be adopted, and future development would not occur. As such, the existing agricultural operations would continue to occur on-site in the same capacity as existing conditions. As no new development would occur, this alternative would not include the proposed improvements to the City's storm drain infrastructure that, under current conditions, results in flooding along Sidonia Street during large storm events (refer to Section 3.8, Hydrology and Water Quality). Although found to be a less than significant impact in this EIR, and therefore not further evaluated in this alternative analysis, this alternative would generally reduce effects related to aesthetics, air quality, energy conservation and greenhouse gas emissions, noise, public services, and recreation as no new development would occur on-site and the existing intensity of the site would remain as current conditions. It should be noted that this alternative would not be consistent with the City's requirement to

provide for housing per the HEU and the City's obligations under the Regional Housing Needs Assessment.

### ***Biological Resources***

Since the project site is largely void of biological resources, it is unlikely that this alternative would result in impacts to biological resources by continuing the existing agricultural operations on-site. Mitigation measures would not be required as construction activities are not proposed by this alternative. As such, potential impacts to migratory birds and raptors as well as the coastal California gnatcatcher would not occur as a result of this alternative. Therefore, impacts to biological resources would be reduced when compared to the proposed project.

### ***Cultural and Tribal Cultural Resources***

Impacts to cultural and tribal resources generally occurs during ground disturbing activities. As this alternative does not include such activities, direct and indirect impacts to unknown cultural and tribal cultural resources is unlikely to occur with this alternative. Therefore, impacts to cultural and tribal cultural resources would be reduced when compared to the proposed project.

### ***Geology and Soils (Paleontological Resources)***

The project site is generally underlain by very old paralic deposits (Lindavista Formation) and Santiago Formation. The Lindavista Formation is assigned a moderate paleontological sensitivity and Santiago Formation is considered to have a high paleontological sensitivity. Impacts to paleontological resources generally occurs during ground disturbing activities. As this alternative does not include such activities, direct and indirect impacts to paleontological resources are unlikely to occur with this alternative. Therefore, impacts to paleontological resources would be reduced when compared to the proposed project.

### ***Hazards and Hazardous Materials***

Based on the results of the Phase I ESA, the proposed project requires mitigation measures to reduce the potentially significant impacts involving the potential release of hazardous materials into the environment. Mitigation measures **HAZ-1** through **HAZ-3** would require the applicant to coordinate with the San Diego County Department of Environmental Health and participate in the Voluntary Assistance Program (VAP) regarding the excavation and disposal of the heavy-oil impacted soils identified near the existing on-site trash compactor and at two additional locations located along the western boundary of the site. Mitigation measures **HAZ-1** through **HAZ-3** would ensure that the contaminated soils are properly removed and disposed of off-site as deemed appropriate by the City of Encinitas Planning Division the San Diego County Department of Environmental Health.

Mitigation measures **HAZ-4 through HAZ-6** would require additional testing of the existing structures on-site to verify the absence of lead-based paint and/or asbestos-related construction materials and any additional remediation during demolition/deconstruction required to safely transport and dispose any lead-based paint and/or asbestos.

The continued use of the existing agriculture operations may lead to an increase in the transport, use, and/or disposal of hazardous materials on-site since heavy chemicals and compounds (e.g. pesticides, herbicides, diesel, gasoline) are generally required to support agriculture operations. However, Alternative 1 would not implement these mitigation measures since construction is not proposed. Therefore, compared to the proposed project, the potential for significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment is increased as a result of this alternative. Impacts would be greater as compared to the proposed project.

### ***Transportation***

As shown Section 3.12, Transportation, the proposed project would generate 1,967 ADT. However, the project would also replace the existing 334 daily trips associated with the existing flower mart, and; therefore, the project's net increase is 1,690 ADT. Additionally, the proposed project would be consistent with the City's General Plan. However, based on the Technical Advisory and Regional TIS Guidelines, the project does not fall below the ADT screening thresholds of either 110 ADT or 1,000 ADT. Therefore, the VMT/Capita and VMT/Employee analysis was prepared using the SANDAG Series 13 Travel Demand Model. Based on this analysis, the proposed project would exceed 85% of the regional VMT/capita or VMT/employee. As a result, mitigation measure **TR-1** requires implementation of a Transportation Demand Management (TDM) Program which includes measures to reduce the proposed project's VMT. Total VMT reduction for the proposed project would be 4.1% for employment related VMT and 1.0% for residential related VMT which does not meet the 15% reduction threshold. As such, the proposed project would result in significant and unavoidable impacts.

As no project would be built under Alternative 1, the existing agriculture operations would continue to operate at current conditions which is approximately 334 ADT. As such, no impacts would occur and this alternative would avoid the significant and unavoidable impact to VMT that would occur from implementation of the proposed project. It is noted that the VMT/employee of the existing operation may exceed 85% of the regional average. Specifically, because the analysis for the proposed project determined that VMT/employee was greater than 85% of the regional average, and because the SANDAG model is regional and based on the location of the project site, it is reasonable to conclude that the No Project Alternative VMT/employee would be similar to that of the proposed project.

**Summary**

Since the project site is largely void of biological resources, it is unlikely that this alternative would result in impacts to biological resources (e.g., potential to affect nesting avian species) by continuing the existing agricultural operations on-site. Impacts relative to cultural, tribal cultural, and paleontological resources (e.g., potential to inadvertently discover unknown resources) would be reduced as the project site would not be developed and existing operations would be maintained at their current capacity. This alternative would result in less transportation impacts as fewer daily vehicle trips would be generated by existing operations as compared to the proposed project. However, it is reasonable to conclude that the No Project Alternative VMT/employee would be similar to that of the proposed project. The continued use of the existing agriculture operations may lead to an increase in the transport, use, and/or disposal of hazardous materials on-site since heavy chemicals and compounds (e.g. pesticides, herbicides, diesel, gasoline) are generally required to support agriculture operations.

As shown in Table 5-1, Comparison of Alternative Project Impacts to the Proposed Project, this alternative would result in reduced impacts relative to biological resources, cultural resources, tribal cultural resources, and paleontological resources, as compared to the proposed project while transportation impacts would be similar to the proposed project. However, because no remediation activities for potentially hazardous conditions on-site would occur, impacts relative to hazards and hazardous materials are considered to be greater as compared to the proposed project since the site would remain in its current state.

It should also be noted that, based on the analysis included in Section 3.8, Hydrology and Water Quality, the proposed project would result in less than significant impacts to hydrology and water quality because it would result in additional pervious area and implement a storm drain system and water quality treatment basins that would reduce runoff from the project site and treat water quality to standards consistent with the municipal separate storm sewer system (MS4) permit. As a result, the proposed project would eliminate the flooding that occurs under existing conditions due to the overall amount of impervious area on the project site. Although not analyzed herein because project impacts were determined to be less than significant, such improvements would not be installed with Alternative 1 and the existing flooding condition would remain. While this is part of the baseline under CEQA, it represents a greater impact to water quality and hydrology than the proposed project. Impacts relative to hydrology/water quality would therefore be greater with Alternative 1 as compared to the proposed project.

## **ALTERNATIVE 2: INCREASED INTENSITY OF EXISTING AGRICULTURAL OPERATIONS**

Under this alternative, development proposed by the project would not occur. However, in contrast to the “No Project” Alternative that would maintain existing operations, the Increased Intensity of Existing Agricultural Operations Alternative would increase the intensity of the agricultural operations on-site, such as constructing new greenhouses and accessory structures. The Encinitas Ranch Specific Plan Agricultural zoning allows for buildings up to 35 feet and may be increased up to 45 feet for up to 10% of the gross floor area. Under this Alternative, buildings on-site would be replaced and/or renovated in conformance with the Agricultural zoning standards. This alternative would not include improvements for ingress/egress to accommodate traffic associated with the increased business intensity (e.g., deliveries, transport of goods, employee traffic) as the current operations is a by-right use. Furthermore, this alternative would not include the proposed improvements to the City’s storm drain infrastructure that presently results in flooding along Sidonia Street during large storm events (refer to [Section 3.8, Hydrology and Water Quality](#)). An analysis of the potential effects of the Alternative is included below.

### ***Biological Resources***

Since the project site is largely void of biological resources, this alternative would generally not be expected to directly or indirectly impact sensitive wildlife or plant species. However, due to the increased intensity of the agricultural operations, construction activities may occur to physically expand operations on-site, such as the construction of new greenhouses. As with the proposed project, construction on the subject site under this alternative would have the potential to indirectly affect avian species if determined to be present at the time construction is undertaken. Therefore, impacts on biological resources would be considered similar to those that would result with the proposed project, and the same mitigation measures as identified with the project would be required.

### ***Cultural and Tribal Cultural Resources***

Due to the increased intensity of the agricultural operations, construction activities may occur to physically expand operations on-site, such as the construction of new greenhouses. As such, direct and indirect impacts to unknown cultural and tribal cultural resources may occur from the various subsurface construction disturbances associated with this alternative. Therefore, similar mitigation measures as the proposed project would be required to address undiscovered cultural resources. Impacts would be similar to the proposed project and considered less than significant with mitigation.

***Geology and Soils (Paleontological Resources)***

The project site is generally underlain by very old paralic deposits (Lindavista Formation) and Santiago Formation. The Lindavista Formation is assigned a moderate paleontological sensitivity and Santiago Formation is considered to have a high paleontological sensitivity. Impacts to paleontological resources generally occurs during ground disturbing activities. Since this alternative may include construction activities, such as the construction of additional greenhouses, direct impacts to unknown paleontological resources may occur from the various subsurface construction disturbances associated with this alternative. As such, similar mitigation measures as the proposed project would still be required to address the recovery of unknown paleontological resources. Therefore, impacts would be less than significant with mitigation incorporated which is similar to the proposed project.

***Hazards and Hazardous Materials***

Based on the results of the Phase I ESA, the proposed project requires mitigation measures to reduce the potentially significant impacts involving the potential release of hazardous materials into the environment. Mitigation measures **HAZ-1** through **HAZ-3** would require the applicant to coordinate with the San Diego County Department of Environmental Health and participate in the Voluntary Assistance Program (VAP) regarding the excavation and disposal of the heavy-oil impacted soils identified near the existing on-site trash compactor and at two additional locations located along the western boundary of the site. Mitigation measures **HAZ-1** through **HAZ-3** would ensure that the contaminated soils are properly removed and disposed of off-site as deemed appropriate by the City of Encinitas Planning Division the San Diego County Department of Environmental Health. Mitigation measures **HAZ-4 through HAZ-6** would require additional testing of the existing structures on-site to verify the absence of lead-based paint and/or asbestos-related construction materials and any additional remediation during demolition/deconstruction required to safely transport and dispose any lead-based paint and/or asbestos.

Alternative 2 would not implement the mitigation measures unless construction of the expanded facilities disturbed the contaminated soil or required the demolition of the existing residence on-site. Furthermore, the increased intensity of the site may lead to an increase in the transport, use, and/or disposal of hazardous materials on-site since heavy chemicals and compounds (e.g. pesticides, herbicides, diesel, gasoline) are generally required to support agriculture operations. Therefore, compared to the proposed project, the potential for significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment is increased as a result of this alternative. Impacts would be greater as compared to the proposed project.



### ***Transportation***

Under this alternative, the intensity of the existing agricultural operations on-site would be increased, such as constructing new greenhouses and accessory structures. The existing buildings on-site would be replaced and/or renovated as needed and the existing residence would be demolished for additional greenhouses. This alternative would not include improvements for ingress/egress to accommodate traffic associated with the increased business intensity (e.g., deliveries, transport of goods, employee traffic) as the current operations is a by-right use. It is expected that ADT would increase greater than existing conditions (334 ADT), but less than the proposed project (1,690 ADT) since this alternative would not include residential housing on-site. Furthermore, since the operations are a by-right use, the project site is not required to reduce VMT. It is noted that the VMT/employee of the existing operation may exceed 85% of the regional average. Specifically, because the analysis for the proposed project determined that VMT/employee was greater than 85% of the regional average, and because the SANDAG model is regional and based on the location of the project site, it is reasonable to conclude that the VMT/employee for this alternative would be similar to that of the proposed project.

### ***Summary***

It is anticipated that this alternative would decrease impacts relative to transportation as fewer daily vehicle trips would be generated by horticultural uses as compared to the proposed project. However, it is reasonable to conclude that the No Project Alternative VMT/employee would be similar to that of the proposed project. Further, the increased intensity of the site would result in additional truck trips (e.g., large delivery trucks, semi-trailers, and dump trucks) which may lead to temporary congestion on Quail Gardens Drive and surrounding intersections. Impacts relative to biological resources (e.g., potential to affect nesting avian species) and cultural resources (e.g., potential to inadvertently discover unknown resources) would be similar to the project as the development footprint of Alternative 2 would generally be the same in order to accommodate the expanded agricultural facilities and operations.

Although the increased intensity of the site is anticipated to increase ADT greater than existing conditions (334 ADT), it is unlikely that this alternative would generate greater ADT than the proposed project (1,690 ADT) since this alternative would not include residential housing on-site. As such, transportation impacts would be similar as compared to the proposed project. The increased intensity of the site may lead to an increase in the transport, use, and/or disposal of hazardous materials on-site since heavy chemicals and compounds (e.g. pesticides, herbicides, diesel, gasoline) are generally required to support agriculture operations; therefore, impacts relative to hazards and hazardous materials are considered to be greater as compared to the proposed project since the site would remain in its current state.

As stated, this alternative would not include the proposed improvements to the City's storm drain infrastructure that, under current conditions, presently results in flooding along Sidonia Street during large storm events. Based on the analysis in [Section 3.8, Hydrology and Water Quality](#), the proposed project would result in less than significant impacts to hydrology and water quality because it would result in addition pervious area and implement a storm drain system and water quality treatment basins that would reduce runoff from the project site and treat water quality to standards consistent with the municipal separate storm sewer system (MS4) permit. As a result, the proposed project would eliminate the flooding that occurs under existing conditions due to the overall amount of impervious area on the project site. Although not analyzed herein because project impacts were determined to be less than significant, under Alternative 2, such improvements would not be installed, and the existing flooding condition would remain because the construction/expansion of greenhouse use would maintain the total impervious area on-site. While this is part of the baseline under CEQA, it represents a greater impact to water quality and hydrology than the proposed project. Impacts for Alternative 2 would be greater relative to hydrology/water quality as compared to the proposed project.

### **ALTERNATIVE 3: VMT REDUCTION ALTERNATIVE**

The VMT Reduction Alternative focuses on reducing the number of daily vehicle trips through a combination of reduced parking and Transportation Demand Management (TDM) strategies in order to avoid or reduce significant and unavoidable impacts associated with VMT. This alternative would (1) provide the minimum number of residential parking spaces required under state density bonus law, and (2) implement unbundled parking, whereby parking spaces are not included in the cost of each residential unit; rather, residents would be required to pay for parking spaces.

Specifically, this alternative would provide 395 residential parking spaces (all of which would be in garages) and would charge renters \$25/month for each space. The overall project design would remain largely unchanged, with the exception that approximately 86 residential surface parking spaces in the residential areas of the proposed project would be converted to landscaping or other green spaces. The parking area in the agricultural amenity area would be for visitors/users of that area exclusively and residential guests or residents would not be permitted to park in this area. [Table 5-2](#) provides a comparison of the number of parking spaces provided under the VMT Reduction Alternative and the proposed project.

**Table 5-2 Parking Provided by VMT Reduction Alternative vs. Proposed Project**

Parking Type	Proposed Project	VMT Reduction Alternative	Difference
Residential Garage Parking Spaces	395	395	--
Residential Surface Parking Spaces	86	0	(86)
Non-Residential Parking Spaces	80	80	--
TOTAL PARKING SPACES	561	475	(86)

Source: Nolen Communities, 2020

Other alternatives to reduce VMT, such as alternative project locations near the COASTER station, reducing the size of residential units, or providing more studio and 1-bedroom units, were considered but rejected because they were either not feasible, did not reduce the identified impacts, and/or did not meet the majority of the project objectives. The VMT Reduction Alternative was developed in accordance with CEQA Section 15126.6(a) which states that an EIR shall describe a range of reasonable alternatives "... which would feasibly attain most of the basic objectives of the project but *would avoid or substantially lessen any of the significant effects of the project*, and evaluate the comparative merits of the alternatives." (*emphasis added*)

### ***Biological Resources***

Since the project site is largely void of biological resources, this alternative would generally not be expected to directly or indirectly impact sensitive wildlife or plant species, similar to the proposed project. As with the proposed project, construction on the subject site under this alternative would have the potential to indirectly affect avian species if determined to be present at the time construction is undertaken. Therefore, impacts on biological resources would be considered similar to those that would result with the proposed project, and the same mitigation measures as identified with the project would be required.

### ***Cultural and Tribal Cultural Resources***

As with the proposed project, construction on the subject site under this alternative would have the potential to directly and/or indirectly impact unknown cultural and tribal cultural resources. Therefore, similar mitigation measures as the proposed project would be required to address undiscovered cultural resources. Impacts would be similar to the proposed project and considered less than significant with mitigation.

### ***Geology and Soils (Paleontological Resources)***

The project site is generally underlain by very old paralic deposits (Lindavista Formation) and Santiago Formation. The Lindavista Formation is assigned a moderate paleontological sensitivity and Santiago Formation is considered to have a high paleontological sensitivity. Impacts to paleontological resources generally occurs during ground disturbing activities. This alternative

would require similar mitigation measures as the proposed project to address the recovery of unknown paleontological resources. Therefore, impacts would be less than significant with mitigation incorporated, similar to the proposed project.

### ***Hazards and Hazardous Materials***

Based on the results of the Phase I ESA, the proposed project requires mitigation measures to reduce the potentially significant impacts involving the potential release of hazardous materials into the environment. Mitigation measures **HAZ-1** through **HAZ-3** would require the applicant to coordinate with the San Diego County Department of Environmental Health and participate in the Voluntary Assistance Program (VAP) regarding the excavation and disposal of the heavy-oil impacted soils identified near the existing on-site trash compactor and at two additional locations located along the western boundary of the site. Mitigation measures **HAZ-1** through **HAZ-3** would ensure that the contaminated soils are properly removed and disposed of off-site as deemed appropriate by the City of Encinitas Planning Division the San Diego County Department of Environmental Health. Mitigation measures **HAZ-4 through HAZ-6** would require additional testing of the existing structures on-site to verify the absence of lead-based paint and/or asbestos-related construction materials and any additional remediation during demolition/deconstruction required to safely transport and dispose any lead-based paint and/or asbestos.

As with the proposed project, development of this alternative would require the implementation of mitigation measures to address the excavation and disposal of the heavy-oil impacted soils identified on-site. Therefore, impacts would be similar to the proposed project and considered less than significant with mitigation.

### ***Transportation***

For land use development projects, the Technical Advisory and Regional TIS Guidelines requires the following metrics be analyzed to determine if a project would result in a significant transportation-related impact:

- **VMT/Capita:** Includes all vehicle-based person trips grouped and summed to the home location of individuals who are drivers or passengers on each trip. This metric includes both home-based and non-homebased trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT/Capita.
- **VMT/Employee:** Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census

tract and then divided by the total number of employees of that census tract to determine the VMT/Employee.

Per the OPR Technical Advisory and the Regional TIS Guidelines, if the project average is lower than either 85% of the regional average or 85% of the average for the city or community in which the project is located, the VMT impacts of the project can be presumed less than significant.

As described in Section 3.12, Transportation, the proposed project would implement Transportation Demand Management (TDM) measures to reduce the project's VMT. Total VMT reduction for the proposed project would be 4.1% for employment related VMT and 1.0% for residential related VMT which does not meet the 15% reduction threshold. As such, the proposed project would result in significant and unavoidable impacts.

Under Alternative 3, transportation impacts related to VMT would be reduced compared to the proposed project. Specifically, impacts related to vehicle miles traveled per capita would be reduced by 7.5% which represents the expected VMT reduction achieved with implementation of reduced parking and implementation of unbundled parking as described below:

Unbundled parking is expected to reduce VMT by 7.5% (SANDAG 2019).

CAPCOA calculates the VMT reduction for limited parking supply using the following equation:

$$\% \text{ VMT Reduction} = (\text{ITE Parking Generation Rate} - \text{Actual Parking Provision}) / \text{ITE Parking Trip Generation Rate} \times 0.5^1$$

The reduction is based on ITE's Parking Trip Generation Rate (not the City's Municipal Code), which is 1.5 spaces/du for mid-rise multi-family units. Below are VMT reductions for example parking ratios that are less than ITE's:

- 1.4 spaces/DU = 3.3%
- 1.3 spaces/DU = 6.7%
- 1.2 spaces/DU = 10%
- 1.1 spaces/DU = 12.5% (maximum reduction allowed)

Alternative 3 would provide 395 residential parking spaces as shown in Table 5-2, which is the minimum number of parking spaces required under the reduced parking requirements allowed under state Density Bonus law. This equates to 1.58 parking space per unit (395 parking spaces / 250 units). Since 1.58 spaces per unit is higher than ITE's rate, there would not be a quantifiable

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<sup>1</sup> Nelson\Nygaard, 2005. *Crediting Low-Traffic Developments* (p. 16), <http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf>.

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**5.0 Alternatives**

VTM reduction for limited parking supply. While there are qualitative benefits of reducing parking, such as limiting potential vehicles within the proposed project, there are no supported, quantifiable reductions to VMT allocable to this alternative based on meeting State Density Bonus minimum parking requirements. Therefore, impacts related to vehicle miles traveled per capita would be reduced by 7.5%. While this represents a reduced VMT/capita, impacts would remain significant and unavoidable (and therefore similar to the proposed project).

Other transportation impacts, including providing emergency access and hazards due to geometric design features, would remain the same as the proposed project under this alternative. Although Alternative 3 would reduce impacts related to VMT compared to the proposed project, impacts to VMT would remain significant and unavoidable because even with implementation of unbundled parking and limited parking supply overall VMT would not reach the 15% reduction threshold. Furthermore, SANDAG specifically states that their “3A. Parking Pricing” TDM measure (7.5% VMT reduction) “works best in areas where on-street parking is managed (e.g., priced parking, residential permit programs, time limits, etc.) to reduce unintended consequences of parking in adjacent neighborhoods.” As the project applicant cannot guarantee that this measure would also be implemented in the adjacent neighborhood (Fox Point – Sidonia Street), this reduction is not wholly supportable. Further, reducing parking supply, while a permitted reduction under state density bonus, would conflict with the City of Encinitas Off-street Parking standards.

***Summary***

Impacts relative to biological resources (e.g., potential to affect nesting avian species), cultural resources (e.g., potential to inadvertently discover unknown resources), and hazardous materials (e.g. excavation and disposal of the heavy-oil impacted soils) would be similar to the project because the development footprint of Alternative 3 would be the same as the proposed project (refer to [Table 5-1](#)). Although not considered a significant impact in the EIR, operational impacts to air quality would be similar but slightly reduced compared to the proposed project while construction air quality impacts would be the same as the proposed project. Specifically, mobile-source emissions may be reduced by up to 7.5% which represents the expected VMT reduction achieved with implementation of reduced parking and implementation of unbundled parking. Similarly, operational impacts to energy usage (i.e., petroleum usage) and greenhouse gases (mobile source emissions) would be slightly reduced compared to the proposed project.

Although Alternative 3 would reduce impacts related to VMT compared to the proposed project, impacts to VMT would remain significant and unavoidable (similar to the proposed project) because even with implementation of unbundled parking and limited parking supply, overall VMT would not reach the 15% reduction threshold. Furthermore, SANDAG specifically states that their “3A. Parking Pricing” TDM measure (7.5% VMT reduction) “works best in areas where on-street

parking is managed (e.g., priced parking, residential permit programs, time limits, etc.) to reduce unintended consequences of parking in adjacent neighborhoods.” As the project applicant cannot guarantee that this measure would also be implemented in the adjacent neighborhood (Fox Point – Sidonia Street), this reduction is not wholly supportable. Impacts would therefore be similar to that resulting with the proposed project.

## **5.5 ALTERNATIVES CONSIDERED BUT REJECTED**

In accordance with CEQA Guidelines Section 15126.6, an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental effects. The following are alternatives that have been rejected by the lead agency (in this case, the City of Encinitas) and will not be analyzed further in this EIR.

### **ALTERNATIVE SITE ALTERNATIVE**

Off-site alternatives are typically included in an environmental document to avoid, lessen, or eliminate a project’s significant impacts by considering the proposed development in a different location. To be feasible, development of off-site locations must be able to fulfill the project purpose and meet most of the project’s basic objectives. It is anticipated that locating the proposed project on off-site lands in the surrounding vicinity would generally result in similar development potential and associated environmental impacts, depending on the developed or undeveloped nature and physical characteristics of the selected site.

However, because Encinitas is generally urbanized and largely built out, impacts relative to biological resources, cultural resources, geology and soils, etc., are anticipated to be similar to those that would result with the project if the same development were built elsewhere in the community. Because most impacts would be similar, and because the proposed project only results in one significant, unavoidable impact, the alternative site would also be required to meet the 15% VMT reduction threshold to avoid significant and unavoidable impacts related to transportation.

Within the City, to achieve the project density of 246 units, only sites with R-30 zoning were considered. These sites are limited to those identified by the 2019 HEU. None of these sites are considered feasible because they are not owned by the project proponent. Further, none of these sites is within “walking distance” (defined as ½ mile or less) of the Encinitas Coaster Station, which may reduce regional VMT by encouraging multi-modal transportation. Therefore, no Alternative

Project Locations were determined to meet the majority of the project objectives and reduce significant and unavoidable impacts to VMT.

Within the region, alternate project location sites to reduce VMT impacts were considered in major employment areas also served by transit and which allow for high-density housing. This limited sites to the UTC area of San Diego (where the current MTS Blue Line trolley is being extended) and downtown San Diego. After reviewing these areas, it was determined that such alternative project locations would be infeasible because none of these sites are owned or controlled by the project proponent, and none would meet the majority of the project objectives including providing an agrihood.

For the above reasons, an off-site alternative is considered infeasible pursuant to CEQA Guidelines Section 15126.6(c). Therefore, the Alternative Site Alternative was rejected from further analysis in the EIR.

### **FULL APPLICATION OF DENSITY BONUS**

Under this alternative, development on the site would be maximized based on full unit allocation allowed under the R-30 overlay, the zoning per the Encinitas Ranch Specific Plan, and the full application of State Density Bonus Law. The R-30 overlay zone (per the City's recent Housing Element Update) was placed on 14.2 acres of the 21.48-acre site (refer to Figure 13 of the Encinitas Ranch Specific Plan, as amended). As a result, the project site could be developed with 426 base residential units (14.2 acres X 30 du/acre) prior to application of a density bonus, and with application of a density bonus the project site could be developed with 575 total residential units (35% increase from base density). This alternative would not result in any diversity of housing types. Based on SANDAG's 2020 projection estimates, this alternative would result in approximately 1,443 residents (2.51 x 575 residential units) compared to the 628 residents for the proposed project (refer to [Section 4.3, Population and Housing](#)). To accommodate the increased population and subsequent traffic, full secondary access on Sidonia Street would be required. Furthermore, as allowed by SB 1397, this project would be considered "by right" and would not be subject to a formal CEQA review. Impacts would not be reduced or avoided; therefore, this alternative was rejected from further analysis in the EIR.

### **REDUCED FOOTPRINT ALTERNATIVE**

Under the Reduced Footprint Alternative, development would be limited to approximately 50% of the project site, with the remainder of the project site converted to Open Space. This alternative would focus development along the Leucadia Boulevard corridor. Due to the compact nature of development under the Reduced Footprint Alternative, most buildings would be required to be four to five stories to meet the minimum density requirement (246 units) of the



2019 HEU while also providing for some type of range of housing in conformance with the project objectives. The farm component and the agricultural amenity area would likely be eliminated (set aside as open space instead), making it difficult to achieve many of the underlying project objectives.

This alternative was considered and rejected because it would not reduce any significant impacts to less than significant. Transportation impacts related to VMT would remain significant and unavoidable and may actually increase because the Reduced Footprint Alternative would not include a mix of uses. This alternative would also result in greater impacts on aesthetics than the proposed project as the height of the buildings would be increased. Impacts to Land Use and Planning would be significant because the agrihood would no longer be developed, which would make the Reduced Footprint Alternative inconsistent with the Encinitas Ranch Specific Plan, (and therefore the General Plan and Zoning Map), and the Local Coastal Plan. Other impacts would not be avoided such as biological resources, cultural resources, hydrology and water quality, hazards and hazardous materials, noise, and public services and utilities because these impacts were already less than significant or mitigated to less than significant.

## **R-5 ALTERNATIVE**

In response to comments received during the Citizen Participation Program (CPP) meeting for the proposed project, an alternative was considered that would provide for 5 dwelling units per acre. Preliminarily, it is understood that such a project would not be permitted under the 2019 HEU, which mandated a minimum of 246 units on the project site to meet RHNA requirements and to comply with HCD's certification. Nonetheless, to meet CEQA requirements to consider a reasonable range of alternatives, the R-5 designation was applied to the entire project site area of 19.7 acres. Using this acreage, the R-5 Alternative would develop 99 units ( $5 \text{ du/acre} \times 19.7 \text{ acres} = 98.5 \text{ units}$ ). Under this R-5 Alternative, the farm component and the agricultural amenity area would be eliminated.

Transportation impacts related to VMT would remain significant and unavoidable and may actually increase because the R-5 Alternative would not include a mix of uses, and would promote land uses that have a tendency to make more vehicle trips. Further, impacts to Land Use and Planning would be significant and unavoidable because the R-5 Alternative would not comply with the underlying zoning, the 2019 HEU, or the Local Coastal Plan. Impacts to biological resources would also be increased because development would occur closer to the Magdalena Ecke Preserve, and impacts to cultural/tribal resources may increase because residential development would require deeper footings and excavations than the proposed organic farm fields in the northern third of the project site. Although these impacts would be anticipated to be reduced to less than significant with incorporation of mitigation measures or project design features, impacts would

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**5.0 Alternatives**

be greater than the proposed project. Furthermore, this alternative would not meet project objectives and would not be allowed under the City's R-30 zoning or underlying agricultural zoning. As this alternative would result in greater impacts than the proposed project and would not meet the underlying project purpose to implement an agrihood community, this alternative was considered and rejected.

**5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

CEQA requires that an environmentally superior alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the No Project Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project's basic objectives be chosen as the environmentally superior alternative.

The No Project Alternative is the environmentally superior alternative. However, in accordance with CEQA Guidelines Section 15126.6(e)(2), a secondary alternative must be chosen since the No Project Alternative is environmentally superior. Therefore, Alternative 3, VMT Reduction Alternative, would be considered the environmentally superior alternative because this alternative potentially reduces a significant and unavoidable impact. However, as noted above, the proposed TDM measure related to unbundled parking may not be feasible as "priced parking works best in areas where on-street parking is managed (e.g., priced parking, residential permit programs, time limits, etc.) to reduce unintended consequences of parking in adjacent neighborhoods." As the project applicant cannot guarantee that this measure would also be implemented in the adjacent neighborhood (Fox Point – Sidonia Street), a neighborhood parking management program (permit only parking) would be necessary in the adjacent neighborhood. Even with effective implementation of such policies, the impacts to VMT would remain significant and unavoidable, similar to the proposed project.